Dear FCC:
Ref: 06-119
 I would like to suggest the
Commission act on some of those issues presented in the report.
--**FIRST**
[Panel:]
that telecommunications infrastructure providers should be afforded
emergency responder status under the Stafford Act ...
...the Independent Panel also recommends that the emergency responder
designation include all types of communications services.
[My response]
ALL Emergency Responders and First Responders should have the training
and be in the proper physical and mental condition to be qualified to respond
to disaster areas. During Katrina and other FEMA hurricane responses,
there have been emergency responders that were sent home and other
that created more work for everyone due to lack of physical prepardness.
People sometime have big hearts when wanting to respond but are not truly
up to the task. There is a standard qualification system in place that works and
this should be used to insure each responder their safety and the safety of others
they may have to work with.
So, prior to just allowing any type of infrastructure provider to participate
within a declared disaster zone, we should consider basic safety procedures and
require "Red Card" qualifications for everyone, without exception down to the
individual employee. This would also comply with the required NIMS compliance
using ICS and is in place now. It should be required of anyone who responds
without exception.
I believe this should also be a requirement for all Volunteers….CERT, Amateur
Radio Operators, Search and Rescue, etc. I am a Wilderness First Responder,
Search and Rescue Team Leader, Wildland Firefighter (Red Card FFT2, RADO,
COMT) in my County and I do not want to have to deal with responders that are
not capable of taking care of themselves… and proper physical conditioning in a
bad situation is a must and that includes corporate America!

--**SECOND**

[Panel:]
"...more than 2,000 police, fire and emergency medical service personnel
were forced to communicate in single channel mode, radio-to-radio,
utilizing only three mutual aid frequencies. Communications assets that
could have been used to fill gaps were apparently not requested or
deployed in sufficient quantities to have a significant impact."

[My response]
I am not sure that is true in many or all cases. First, no one was forced to do
anything. Many of those 2000 users wanted and needed to be on those
channels. Second, NIRCS was deployed and there, were they not?

Just those NIRCS assigned frequencies have dozens of frequencies including Command and Logistics repeaters as well as Aircraft links. There were ham radio operators all over the USA waiting to handle emergency and health and welfare traffic and there were dozens of Hams passing traffic. Much of this was ignored and even refused in the areas that needed it.
In many cases, agencies sharing simplex frequencies is not a bad thing at all. Most all local command and logistics comm can happen on simplex frequencies without any issues. The problem lies in communications management.
In those areas that were reported, how many of them had a COMC or a COML or a COMT to help coordinate freqs? I'll bet most areas did not have this during and prior to the event. Basic radio knowledge is very much lacking. One example is running a 100 watt mobile VHF radio to talk 3 blocks to another one running 100 watts when a pair of 2 watt Handie-Talkies would have done the job and allowed the frequency to be re-used in other areas that were being clobbered with the 100 watt mobiles. This stuff happens all the time. Any seasoned radio person can tell you these conditions exist and it revolves around proper management. One report I heard about was a helicopter flying around with a repeater in it so that one area could communicate through it….which interfered with towns not associated with that local area.

--THIRD
[Panel:]
"Pre-positioning for FCC Regulatory Requirements =96 An A Priori Program for Disaster Areas. The FCC should explore amending its rules to permit automatic grants of certain types of waivers or special temporary authority (STA) in a particular geographic area if the President declares that area to be a "disaster area"."

[My response]
I think the FCC has allowed for Emergency situations in most all of it's Part's and rules that I have read over the years. However, it seems to seldom be understood and therefore, much opinionated ideas on what is an emergency and what one can do on a radio prevails. The FCC rules….all of them, need to better define what can be done on any radio when life or property or the environment are threatened. One example is within the Amateur Radio Ranks which suffer from the lack of adequate HF spectrum to take advantage of newer advances in communications such as PACTOR 2 and PACTOR 3. During declared emergencies, if the Hams were allowed temporary use of the spectrum above and below their existing HF bands as well as being able to share federal frequencies, they sure could operate better.
Networks like SHARES which operate HF BBS's using PACTOR 1 have one or two HF frequencies to do this on! Well this is just plan bad management and they need more channels and need to be able to run PACTOR 2 and 3.

--FOURTH
{Panel:]
"In general, cellular/PCS base stations were not destroyed by
Katrina,... the majority of the adverse effects and outages encountered
by wireless providers were due to a lack of commercial power or a lack
of transport connectivity to the wireless switch (wireline T1 line lost
or fixed microwave backhaul offline). ... However, within one week after
Katrina, approximately 80 percent of wireless cell sites were up and
running."

{My response]
Telcos and the like realized that their deployment of emergency generators was
terrible. And, it seems to me, since deregulation, and I can prove this, telcos
have relaxed their standards in regards to emergency power back up. I know of
telco generators that have not had their oil changed in over 5 years. Telcos do
not choose to invest in the maintainance of their equipment anymore. Their
manpower which use to maintain generators has been reduced to figures that
would not allow any possible hope of restoring a mass amount of out of service
generators in a timely fashion on a normal work load, let alone a disaster and
nobody, including the FCC seems to care.
They are in the business for the easy money and current trends prove this.
You can see this for yourselves if you would get out and actually visit telcos in
rural settings. At least on the West Coast, Verizon is one of the worst.

--FIFTH
[Panel:]
"Amateur Radio Service. ...Amateurs provided wireless communications in
many locations where there was no other means of communicating and also
provided other technical aid to the communities affected by Katrina."

[My response]
Amateur Radio Operators (Hams)are hindered by the current lack of HF
spectrum that allows PACTOR 3 communications using systems like Winlink.
As I mentioned above, that could easily be fixed.
As the panel has mentioned, credentialing and security problems hampered all
types of responders. Hams are especially stricken by these problems. Local
governments in many areas lack the resources to support their volunteers
properly.